

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION**

UNITED STATES OF AMERICA,)	Criminal No.: 1:24-CR-00412
)	
)	
)	MOTION FOR DISCLOSURE
)	OF INTENT TO USE
vs.)	EVIDENCE OF OTHER
)	CRIMES, WRONGS, OR ACTS
)	UNDER FEDERAL RULES OF
Thomas Allen Bateman, Jr,)	EVIDENCE 404(B)
)	
)	
)	
Defendant.)	
_____)	

The Defendant, Thomas Allen Bateman, Jr, through his undersigned attorney, does hereby move the Court, pursuant to Federal Rules of Evidence, Rule 404(b), for an Order requiring the Government to disclose its intent to use any evidence of other crimes, wrongs, or acts as proof of motive, opportunity, intent preparation, plan, knowledge, identity, absence of mistake, accident, or any other purpose. In this regard, the Government should specify the particular crime, wrong, or act to be used and the particular theory upon which it is admissible.

Respectfully submitted,

By: /s/ Marion M. Moses
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June 24, 2024

Columbia, South Carolina